mainly to be feared. *Patsone* v. *Pennsylvania*, 232 U. S. 138. But, in view of recent events, undue ardor in restricting aliens may be expected and this tendency must be checked by the courts. Thus, a statute which prohibited the employment of aliens beyond a certain percentage of the total number of employees was properly declared unconstitutional. *Truax* v. *Raich*, 239 U. S. 33. However, a state may refuse to grant liquor licenses to aliens. *Trageser* v. *Gray*, 73 Md. 250, 20 Atl. 905. Or peddlers' licenses. *Commonwealth* v. *Hana*, 195 Mass. 262, 81 N. E. 149. *Contra*, *State* v. *Montgomery*, 94 Maine, 192, 47 Atl. 165. But not barbers' licenses. *Templar* v. *Board of Examiners*, 131 Mich. 254, 90 N. W. 1058. It seems proper, in the exercise of the police power, that the legislature primarily should decide whether there is sufficient reason to deny to aliens a given privilege. In the principal case, the restriction seems well within the discretion of the legislature.

CONTRIBUTORY NEGLIGENCE — STATUTORY ACTIONS — NEGLIGENCE OF AN EMPLOYEE OF A PROHIBITED CLASS. — A statute provided that no child under fourteen years of age should be employed to run an elevator. The plaintiff sues for injuries received while employed in violation of this statute. His injuries were partly the result of his own negligence. *Held*, that the plaintiff recover. *Karpeles* v. *Heine et al.*, 124 N. E. 101 (N. Y.).

Obviously, the decision is to be limited to cases where the plaintiff is one of a class which the violated statute intended to protect or benefit. Yet even in such cases the majority of the older decisions allowed the defense of contributory negligence. *Freeman* v. *Glens Falls Paper Mill Co.*, 70 Hun (N. Y.) 530; *Lee* v. *Stirling Silk Mfg. Co.*, 115 N. Y. App. Div. 589, 101 N. Y. Supp. 78. But the modern tendency is in accord with the principal case. *Strafford* v. *Republic Iron and Steel Co.*, 238 Ill. 371, 87 N. E. 358; *Lenahan* v. *Pittston Coal Mining Co.*, 218 Pa. 311, 67 Atl. 642. There is still, however, authority in support of the opposite view. See *Berdos* v. *Tremont & Suffolk Mills*, 209 Mass. 489, 95 N. E. 876, 879. It is submitted that the confusion arises from the attempt to treat the liability incurred by the violation of the statute in these cases as based on negligence, whereas it is really an absolute liability. This view is not without support. See *Lenahan* v. *Pittston Coal Mining Co.*, *supra*.

CORPORATIONS — CORPORATE STOCK — ATTACHMENT — REFUSAL TO ISSUE CERTIFICATES OF STOCK. — At a judicial sale under statutory provisions, the plaintiff bought shares of stock in a domestic corporation. The shares were owned by a nonresident, who at the time held the certificates outside of the jurisdiction. Thereupon the plaintiff demanded of the officers of the corporation that they issue to him new certificates. On their refusal he sued for the value of the stock. *Held*, that no statute imposed any duty on the corporation to transfer the stock upon its books. *Harris* v. *Mid-Continent Life Ins. Co.*, 182 Pac. 85 (Okla.).

Some courts hold, with the principal case, that stock is an intangible property right subject to attachment only at the situs of the corporation, and that the certificates are but evidence of ownership. *Maertens* v. *Scott*, 33 R. I. 356, 80 Atl. 369; *Barber* v. *Morgan*, 84 Conn. 618, 80 Atl. 791. The court admits that the purchaser at the attachment sale became a stockholder. As such he was entitled to a certificate. *Commercial Bank* v. *Kortright*, 22 Wend. (N. Y.) 348; *Nat'l Bank* v. *Watsontown Bank*, 105 U. S. 217; *Rio Grande Cattle Co.* v. *Burns*, 82 Texas, 50, 17 S. W. 1043. Without it his right practically was nonmarketable. See 1910 1 REV. LAWS OF OKLA., § 1237. Had the corporation issued the certificates to the plaintiff it would have incurred the risk of liability to a *bona fide* purchaser of the outstanding certificates. *Nat'l Bank* v. *Stribling*, 16 Okla. 41, 86 Pac. 512. See 2 COOK ON CORPORATIONS, 7 ed., § 489. The decision makes the assumption of this risk